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16 Counsel for the DRRT Claimants

17 **UNITED STATES BANKRUPTCY COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 In re:

21 PG&E CORPORATION,

22 - and -

23 PACIFIC GAS AND ELECTRIC  
24 COMPANY,

25 Debtors.

26 Affects PG&E Corporation

27 Affects Pacific Gas and Electric Company

28 ☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

Chapter 11

**MOTION FOR LEAVE TO FILE LATE  
AND OPPOSITION TO REORGANIZED  
DEBTORS' ELEVENTH, THIRTEENTH,  
AND FOURTEENTH SECURITIES  
CLAIMS OMNIBUS OBJECTIONS  
(CLAIMS BARRED BY THE STATUTE  
OF REPOSE)**

**Hearing Information:**

Date: November 9, 2021  
Time: 10:00 a.m. (Pacific Time)  
Place: (Telephone Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

Individual Claimants DRRT FBO BAYERNINVEST  
KAPITALVERWALTUNGSGESELLSCHAFT MBH, DRRT FBO CREDIT SUISSE FUNDS AG,  
DRRT FBO DEKA INVESTMENT GMBH, DRRT FBO GIAM GENERALI INSURANCE ASSET  
MANAGEMENT, DRRT FBO HELABA INVEST KAPITALANLAGEGESELLSCHAFT MBH,  
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELLSCHAFT MBH, DRRT FBO KAISER  
PERMANENTE, DRRT FBO MEAG MUNICH ERGO KAPITALANLAGEGESELLSCHAFT MBH,  
DRRT FBO METZLER ASSET MANAGEMENT GMBH, DRRT FBO SWISS REINSURANCE  
COMPANY LTD, DRRT FBO SWISSCANTO FONDSLEITUNG AG, DRRT FBO UBS FUND  
MANAGEMENT (SWITZERLAND) AG and DRRT FBO UBS FUND MANAGEMENT  
LUXEMBOURG S.A. (“**DRRT Claimants**”) as creditors in the chapter 11 bankruptcy cases (the  
“**Chapter 11 Cases**”) of the above-captioned debtors (as reorganized pursuant to the Plan, the  
“**Reorganized Debtors**”), respectfully submit this Motion to File Opposition Late and to Oppose  
Reorganized Debtors’ Eleventh, Thirteenth, and Fourteenth Securities Claims Omnibus Objections  
[Docket Nos. 11014, 11085, 11339] seeking to expunge certain debt-based securities proofs of claim as  
barred by the statute of repose under Section 11 of the Securities Act of 1933 (the “**Securities Act**”).

**MOTION FOR LEAVE TO FILE OPPOSITION LATE**

As grounds for this motion, the DRRT Claimants state that they did not receive effective notice of  
the Eleventh, Thirteenth, or Fourteenth Securities Claims Omnibus Objections and were unable to lodge  
their objections until this time. In addition, since other claimants lodged objections before and after the  
purported August 31, 2021 and September 15, 2021 deadlines to do so for the Eleventh and Thirteen  
Securities Claims Omnibus Objections, there will be no prejudice to the parties or disruption of the Court’s  
schedule by allowing the DRRT Claimants to appear and assert their opposition to the Debtors’ identical  
Eleventh, Thirteenth, and Fourteenth Securities Claims Omnibus Objections.

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**OPPOSITION**

The Fourteenth Objection makes the same arguments and is based on the same incorrect premise as the Reorganized Debtors' Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred By the Statute of Repose). The DRRT Claimants therefore file this Joinder in support of the PGIM FI Claimants' Response and Opposition to Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (the "**PGIM Response and Opposition**") [Docket No. 11168] and Oregon's Opposition to Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (Claims Barred By the Statute of Repose) (the "**Oregon Opposition**") [Docket No. 11170] as their opposition to the Eleventh, Thirteenth, and Fourteenth Objections.

The DRRT Claimants hereby join the PGIM Response and Opposition and the Oregon Opposition. The DRRT Claimants support, adopt and incorporate by reference the arguments made therein.<sup>1</sup> The DRRT Claimants respectfully submit that the arguments against granting the Eleventh Omnibus Objection apply with equal force and weight in favor of denying the Thirteenth and Fourteenth Omnibus Objections as well.

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**JOINDER IS APPROPRIATE AND SERVES JUDICIAL EFFICIENCY**

Because the Thirteenth and Fourteenth Omnibus Objections add no new arguments to the Eleventh Omnibus Objection, it serves judicial efficiency and avoids a waste of resources by the parties for the DRRT Claimants to file this simple joinder and incorporate arguments made in response to the Eleventh Omnibus Objection. The Fourteenth Omnibus Objection is a near copy of the Eleventh and Thirteenth Omnibus Objections. Debtors acknowledge as much in their objection, referencing "identically situated

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<sup>1</sup> In conformance with the ADR Procedures adopted by this Court, the DRRT Claimants provide Appendix A, listing information relevant to their claims, including claim numbers.



1 claims in the eleventh and thirteenth securities claims omnibus objections, each of which also sought to  
2 disallow and expunge claims based on debt securities where the offerings took place more than three  
3 years before the Petition Date.” See Fourteenth Omnibus Objection Pg. 2 Lines 26-27; Pg. 3 Line 1.  
4 Where, as here, a party makes the exact same arguments via separate motions or sets of papers, the  
5 DRRT Claimants respectfully submit it serves overall efficiency to incorporate and apply responses to  
6 one motion or set of arguments to the other without burdening the Court with additional and unnecessary  
7 submissions.  
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10 **RESERVATION OF RIGHTS**

11 The DRRT Claimants reserve all of their respective rights, claims, defenses, and remedies,  
12 including, without limitation, the right to amend, modify, or supplement this request in accordance with  
13 applicable rules.  
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18  
19 Dated: October 27, 2021

DRRT

20 By: \_\_\_\_\_

JARED LAY

21  
22 *Attorney for the DRRT Claimants*  
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**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO BAYERNINVEST KAPITALVERWALTUNGS GESELLSCHAFT MBH	98950	4/10/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5000
DRRT FBO CREDIT SUISSE FUNDS AG	101098	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5001
DRRT FBO CREDIT SUISSE FUNDS AG	101174	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5002
DRRT FBO CREDIT SUISSE FUNDS AG	101102	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5003
DRRT FBO CREDIT SUISSE FUNDS AG	101134	4/16/2020	\$ 702,195.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5004
DRRT FBO CREDIT SUISSE FUNDS AG	101205	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5005

APPENDIX A

Creditor	Claim No.	Date	Amount of Claim	NOTICE ADDRESS
DRRT FBO DEKA INVESTMENT GMBH	101167	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5006
DRRT FBO DEKA INVESTMENT GMBH	101410	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5007
DRRT FBO DEKA INVESTMENT GMBH	101465	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5008
DRRT FBO GIAM GENERALI INSURANCE ASSET MANAGEMENT	100042	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5009
DRRT FBO HELABA INVEST KAPITALANLAGEGESELL SCHAFT MBH	99393	4/14/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5010
DRRT FBO HELABA INVEST KAPITALANLAGEGESELL SCHAFT MBH	99395	4/14/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5011

**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO HELABA INVEST KAPITALANLAGEGESELL SCHAFT MBH	99288	4/14/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5012
DRRT FBO HELABA INVEST KAPITALANLAGEGESELL SCHAFT MBH	99550	4/14/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5013
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99604	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5014
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99647	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5015
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99630	4/15/2020	\$ 651,750.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5016
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99607	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5017



**APPENDIX A**

Creditor	Claim No.	Date	Amount of Claim	NOTICE ADDRESS
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	100137	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5018
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99714	4/15/2020	\$ 415,950.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5019
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	99739	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5020
DRRT FBO INTERNATIONALE KAPITALANLAGEGESELL SCHAFT MBH	100154	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5021
DRRT FBO KAISER PERMANENTE	98964	4/9/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5022
DRRT FBO KAISER PERMANENTE	98968	4/9/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5023



**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO KAISER PERMANENTE	98995	4/10/2020	\$ 641,250.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5024
DRRT FBO KAISER PERMANENTE	99006	4/10/2020	\$ 235,337.50	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5025
DRRT FBO KAISER PERMANENTE	99002	4/10/2020	\$ 322,437.50	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5026
DRRT FBO MEAG MUNICH ERGO KAPITALANLAGEGESELL SCHAFT MBH	100717	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5027
DRRT FBO METZLER ASSET MANAGEMENT GMBH	100338	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5028
DRRT FBO METZLER ASSET MANAGEMENT GMBH	100940	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5029

**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO SWISS REINSURANCE COMPANY LTD	99707	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5030
DRRT FBO SWISS REINSURANCE COMPANY LTD	99816	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5031
DRRT FBO SWISS REINSURANCE COMPANY LTD	100153	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5032
DRRT FBO SWISS REINSURANCE COMPANY LTD	99829	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5033
DRRT FBO SWISS REINSURANCE COMPANY LTD	99841	4/15/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5034
DRRT FBO SWISSCANTO FONDSLEITUNG AG	98869	4/8/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5035

**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100514	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5036
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100541	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5037
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100109	4/16/2020	\$ 633,250.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5038
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	99997	4/16/2020	\$ 339,000.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5039
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100547	4/16/2020	\$ 478,912.50	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5040
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100585	4/16/2020	\$ 593,525.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5041

**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100543	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5042
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100560	4/16/2020	\$ 308,875.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5043
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100430	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5044
DRRT FBO UBS FUND MANAGEMENT (SWITZERLAND) AG	100589	4/16/2020	\$ 1,197,375.00	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5045
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100606	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5046
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100178	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5047



**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100072	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5048
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100199	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5049
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100210	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5050
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100118	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5051
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100107	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5052
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100633	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5053

**APPENDIX A**

<b>Creditor</b>	<b>Claim No.</b>	<b>Date</b>	<b>Amount of Claim</b>	<b>NOTICE ADDRESS</b>
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100670	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5054
DRRT FBO UBS FUND MANAGEMENT LUXEMBOURG S.A.	100334	4/16/2020	\$ -	Alexander Reus DRRT 340 WEST FLAGLER ST, SUITE 201 MIAMI FL 33130 PPMCLAIMS@DRRT.COM (786) 235-5055